

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA

§

SEALED

v.

§

[REDACTED] (1)  
CHRISTOPHER DALE JULIAN (2)

§ Case No. 4:24-CR-19  
§ Judge Jordan

[REDACTED] (3)

§

[REDACTED] (4)

§

[REDACTED] (5)

§

[REDACTED]

§

[REDACTED] (7)

§

[REDACTED] (8)

§

[REDACTED]

§

[REDACTED] (9)

§

[REDACTED] (10)

§

[REDACTED]

§

[REDACTED] (11)

§

[REDACTED]

§

[REDACTED] (12)

§

[REDACTED]

§

[REDACTED] (13)

§

[REDACTED]

§

[REDACTED] (15)

§

[REDACTED] (16)

§

[REDACTED]

§

[REDACTED] (17)

§

**FIRST SUPERSEDING INDICTMENT**

THE UNITED STATES GRAND JURY CHARGES:

**Count One**

Violation: 21 U.S.C. § 846  
(Conspiracy to Possess with Intent  
to Manufacture, Distribute and  
Dispense A Controlled Substance  
Analogue)

That from sometime in or about January 2022, and continuously thereafter up to and including the date of this First Superseding Indictment, in the Eastern District of Texas and elsewhere,

[REDACTED]  
**Christopher Dale Julian**  
[REDACTED]  
[REDACTED]  
[REDACTED]

defendants, did knowingly and intentionally combine, conspire, and agree with each other and other persons known and unknown to the United States Grand Jury, to knowingly and intentionally possess with the intent to distribute mixtures or substances containing detectable amounts of a Schedule 1 controlled substance, to wit: ADB-BUTINACA, and MDMB-4en-PINACA, a violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(c); knowing that the substance was intended for human consumption as provided in 21 U.S.C. § 813.

All in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C) and 846.

**Count Two**

Violation: 18 U.S.C. § 1956(h)  
(Conspiracy to Commit Money Laundering in Violation of 18 U.S.C. § 1956(a)(1)(B)(i))

That from sometime in or about January 2022 and continuously thereafter up to and including the date of this First Superseding Indictment, in the Eastern District of Texas and elsewhere,

[REDACTED]  
**Christopher Dale Julian**  
[REDACTED]  
[REDACTED]

[REDACTED]

defendants, did knowingly, willfully, and unlawfully combine, conspire, confederate, and agree together and with each other, and with others known and unknown to the Grand Jury, to commit certain offenses against the United States, to-wit: to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce that involved the proceeds of a specified unlawful activity, that is, Conspiracy to Possess with Intent to Distribute a Controlled Substance, to-wit: controlled substance analogues, as described in Count One of this First Superseding Indictment, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

All in violation of 18 U.S.C. § 1956(h).

**Count Three**

Violation: 21 U.S.C. § 846  
(Conspiracy to Possess with Intent to Manufacture, Distribute and Dispense A Controlled Substance Analogue)

That from sometime in or about January 2022, and continuously thereafter up to and including the date of this Indictment, in the Eastern District of Texas and elsewhere,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

defendants, did knowingly and intentionally combine, conspire, and agree with each other and other persons known and unknown to the United States Grand Jury, to knowingly and intentionally possess with the intent to distribute mixtures or substances containing detectable amounts of a Schedule 1 controlled substance, to wit: ADB-BUTINACA, and MDMB-4en-PINACA, a violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(c); knowing that the substance was intended for human consumption as provided in 21 U.S.C. § 813.

All in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C) and 846.

**Count Four**

Violation: 18 U.S.C. § 1956(h)  
(Conspiracy to Commit Money  
Laundering in Violation of 18  
U.S.C. § 1956(a)(1)(B)(i))

That from sometime in or about January 2022 and continuously thereafter up to and including the date of this First Superseding Indictment, in the Eastern District of Texas and elsewhere,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

defendants, did knowingly, willfully, and unlawfully combine, conspire, confederate, and agree together and with each other, and with others known and unknown to the Grand Jury, to commit certain offenses against the United States, to-wit: to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce that involved the proceeds of a specified unlawful activity, that is, Conspiracy to Possess with Intent to Distribute a Controlled Substance, to-wit: controlled substance analogues, as described in Count Three of this First Superseding Indictment, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

All in violation of 18 U.S.C. § 1956(h).

**NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE**  
(Pursuant to 21 U.S.C. § 853 and 18 U.S.C. § 982(a)(1))

As a result of committing the offense charged in Counts One, Two, Three, and Four of this First Superseding Indictment, the defendants shall forfeit to the United States any property constituting, or derived from, proceeds obtained directly or indirectly, as the result of the offenses alleged in this First Superseding Indictment and any property they may have used or intended to be used to commit or facilitate the offenses.

If any of the property described above as being subject to forfeiture as a result of any act or omission of the defendants-

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with a third person;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property, including but not limited to all property, both real and personal owned by the defendants.

By virtue of the commission of the offenses alleged in this First Superseding Indictment, any and all interest the defendants have in the above-described property is vested in and forfeited to the United States.

A TRUE BILL

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GRAND JURY FOREPERSON

DAMIEN M. DIGGS  
UNITED STATES ATTORNEY

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CHRISTOPHER T. RAPP  
Assistant United States Attorney

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Date

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[REDACTED] (10)  
[REDACTED] (11)  
[REDACTED] (12)  
[REDACTED] (13)  
[REDACTED] (14)  
[REDACTED] (15)  
[REDACTED] (16)  
[REDACTED] (17)

**NOTICE OF PENALTIES**

**Counts One and Three**

Violation: 21 U.S.C. § 846

Penalty: Imprisonment not to exceed 20 years; a fine not to exceed \$1 million, or both; a term of supervised release of at least 3 years.

Special Assessment: \$100.00

**Counts Two and Four**

Violation: 18 U.S.C. § 1956(h)

Penalty: Not more than 20 years imprisonment; a fine not to exceed \$500,000 or twice the pecuniary gain or loss, and a term of supervised release of not more than 3 years if the conspiracy is to violate 18 U.S.C. § (a)(1)(B)(i);

Special Assessment: \$100.00